

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	BANKRUPTCY NO. 15-52462-CAG
FPMC SAN ANTONIO REALTY	§	
PARTNERS, LP,	§	CHAPTER 11 PROCEEDING
	§	
DEBTOR	§	

**MOTION FOR EXPEDITED HEARING ON DEBTOR’S EMERGENCY MOTION FOR
ENTRY OF INTERIM AND FINAL ORDERS (I) AUTHORIZING DEBTOR TO (A)
OBTAIN POSTPETITION FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361, 362,
364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1), AND 364(e) AND (B) USE CASH COLLATERAL
PURSUANT TO 11 U.S.C. § 363, (II) GRANTING ADEQUATE PROTECTION
PURSUANT TO 11 U.S.C. §§ 361, 362, 363, AND 364, AND (III) SCHEDULING FINAL
HEARING PURSUANT TO BANKRUPTCY RULES 4001(b) AND (c)**

TO THE HONORABLE CRAIG A. GARGOTTA, UNITED STATES BANKRUPTCY JUDGE:

NOW COMES the debtor and debtor in possession in the above-captioned case (the “Debtor”), respectfully submit this Motion for Expedited Hearing (the “Motion to Expedite”) on Debtor’s Emergency Motion for Entry of Interim and Final Orders (i) Authorizing Debtor to (A) Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1), and 364(e) and (B) Use Cash Collateral Pursuant to 11 U.S.C. § 363, (ii) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361, 362, 363, And 364, and (iii) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (the “Motion”). In support of the Motion to Expedite, the Debtor respectfully states as follows:

1. On October 6, 2015 (the “Petition Date”), the Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Case”).
2. Contemporaneous with filing the Motion to Expedite, the Debtor filed the Motion.
3. A copy of the proposed order in conformity with Local Rule 9013 is attached hereto as Exhibit A.

4. Pursuant to § 105(a) of the Bankruptcy Code, “[t]he court may issue any order . . . that is necessary or appropriate to carry out the provision of this title.” Rule 9006 of the Federal Rules of Bankruptcy Procedure allows the Court to grant the relief requested herein. Debtor requests that the Court set an expedited hearing on the Motion. There is good and sufficient cause to grant this Motion to Expedite.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order setting an expedited hearing on the Motion and granting such other relief as is just and proper.

Respectfully submitted this the 20th day of October, 2015.

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By: /s/ Raymond W. Battaglia
Raymond W. Battaglia
Texas Bar No. 01918055

ATTORNEYS FOR FPMCSANANTONIO
REALTY PARTNERS, LP

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court’s CM/ECF system, as set forth below. I further certify that it has been transmitted by first class mail to the parties on the attached service list

/s/ Raymond W. Battaglia
Raymond W. Battaglia